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*Attorneys for Defendants UnitedHealthcare
Insurance Company and United Behavioral
Health*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a
California Corporation,
UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation, and
MULTIPLAN, INC., a New York corporation,

Defendants.

CASE NO. 4:20-cv-02254-YGR

**DECLARATION OF LAUREN BLAS IN
SUPPORT OF DEFENDANTS' MOTION
FOR ADMINISTRATIVE RELIEF
PURSUANT TO L.R. 7-11 FOR LEAVE TO
FILE TEN ADDITIONAL PAGES FOR
THEIR MEMORANDUM IN OPPOSITION
TO CLASS CERTIFICATION**

Hon. Yvonne Gonzalez Rogers

1 I, Lauren Blas, state and declare as follows:

2 1. I am a partner at Gibson, Dunn & Crutcher LLP, and counsel of record for Defendants
3 United Healthcare Insurance Company (“UHC”) and United Behavioral Health (“UBH”) (together,
4 “United Defendants”) in the above-captioned case. I have personal knowledge of the facts set forth
5 in this Declaration, and, if called as a witness, could and would testify competently to such facts
6 under oath.

7 2. I submit this declaration under Local Rule 7-11 in support of Defendants’ Motion for
8 Administrative Relief for Leave to File Ten Additional Pages for Their Memorandum in Opposition
9 to Class Certification (“Administrative Motion”).

10 3. On February 14, 2024, counsel to United Defendants wrote to counsel for Plaintiffs
11 asking if they would oppose the Administrative Motion. On February 15, 2024, Plaintiffs’ counsel
12 stated they would not oppose the Administrative Motion provided Defendants’ counsel would agree
13 not to oppose a request for additional pages for Plaintiffs’ reply, which Defendants assented to.

14 I declare under penalty of perjury that the foregoing is true and correct.
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17 DATED: February 21, 2024

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

19 By: /s/ Lauren M. Blas
20 Lauren M. Blas

21 *Attorney for Defendants UnitedHealthcare Insurance*
22 *Company and United Behavioral Health*
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